

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

VRINGO, INC., et ano.

Plaintiffs,

v.

ZTE CORPORATION, et ano.

Defendants

Civ. No. 14-cv-4988 (LAK)

ZTE CORPORATION,

Plaintiff,

v.

VRINGO, INC., et ano.

Defendants

Civ. No. 15-cv-0986 (LAK)

NOTICE OF MOTION TO FILE UNDER SEAL

PLEASE TAKE NOTICE that upon the annexed memorandum of law and the supporting Declaration of Amber Wessels-Yen dated April 10, 2015, Plaintiffs Vringo, Inc. and Vringo Infrastructure, Inc. (collectively, “Vringo”), by its undersigned attorneys, will move this Court at the United States Courthouse, 500 Pearl Street, New York, New York, on a date and at a time designated by the Court, for an Order sealing the unredacted version of Vringo’s letter brief (filed contemporaneously herewith), on the ground that this document contains confidential information.

Dated: New York, New York
April 10, 2015

ALSTON & BIRD LLP

By: /s/ Amber Wessels-Yen

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